

EXHIBIT B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*³

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. _____

**ORDER GRANTING ALL STATE BROKERAGE, INC.’S MOTION FOR
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

Upon the motion⁴ (the “Motion”) of All State Brokerage, Inc. (the “Claimant”) for entry of an order (i) allowing Claimant’s Administrative Expense Claim in the amount of \$1,021,403.96; (ii) compelling the Debtors to pay such amounts promptly after entry of an order approving the Motion; and (iii) granting any other relief that the Court finds just and proper; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U. S. C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Federal Rules of Bankruptcy Procedure and the Local

³ The debtors and debtors in possession in these chapter 11 cases (hereafter, “**Debtors**”) are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Brophyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277).

⁴ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved, or overruled on the merits; and a hearing (if any) having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before this Court; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. The Claimant's Administrative Expense Claim against the Debtors is allowed in the amount of \$1,021,403.96 pursuant to 11 U.S.C. § 503(b).
3. The Debtors are directed to pay the allowed Administrative Expense Claim in the amount of \$1,021,403.96 to Claimant, All State Brokerage, Inc., within seven (7) days of the entry of this Order.
4. The Debtors and Claimant are directed and authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
5. Nothing in this Order shall prejudice the rights of the Claimant to seek additional relief or assert further claims related to the matters set forth in the Motion or any other matter.
6. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.